

UNITED STATES DISTRICT COURT **SUPPRESSED**
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

FILED

DEC - 3 2020

UNITED STATES OF AMERICA,

)

U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

Plaintiff,

)

v.

)

RONALD SAUNDERS,

)

Defendant.

)

4:20CR762 SEP/DDN

INDICTMENT

COUNT I

The Grand Jury charges that:

At all times pertinent to the charges in this indictment:

1. Federal law defines the term

(a) "minor" to mean any person under the age of eighteen years (18 U.S.C. § 2256(1));

(b) "sexually explicit conduct" to mean actual or simulated--

(i) sexual intercourse, including genital-genital, anal-genital, oral-genital, oral-anal, whether between persons of the same or opposite sex,

(ii) bestiality,

(iii) masturbation,

(iv) sadistic or masochistic abuse, or

(v) lascivious exhibition of the genitals, anus or pubic area of any person (18 U.S.C. §2256(2)(A)); and

(c) "computer" to mean an electronic, magnetic, optical, electrochemical or other high speed data processing device performing logical, arithmetic or storage functions, including any data storage facility or communications facility directly related to or operating in conjunction with such device. (18 U.S.C. §2256(6));

(d) "child pornography" to mean any visual depiction, including any photograph, film, video, picture, or computer or computer-generated image or picture, whether made or produced by electronic, mechanical, or other means, of sexually explicit conduct, where-

(A) the production of such visual depiction involves the use of a minor engaging in sexually explicit conduct; or

(C) such visual depiction has been created, adapted, or modified to appear that an identifiable minor is engaging in sexually explicit conduct. (18 U.S.C. §2256(8)).

2. On or between about June 3, 2020 and September 21, 2020, in Jefferson County, Missouri, in the Eastern District of Missouri and elsewhere,

RONALD SAUNDERS,

the Defendant herein, did knowingly employ, use, persuade, induce, entice and coerce a minor, A.W., to engage in sexually explicit conduct, including masturbation and a lascivious display of her genitals, and said sexually explicit conduct was for the purpose of producing a visual depiction of such conduct, to wit: the Defendant directed A.W. to engage in acts of masturbation and lascivious displays of her genitals and further directed her to video record such conduct and send the videos, and such depictions were transported or transmitted in or affecting interstate and foreign commerce and were produced using materials, to-wit: an Apple iPhone Xr, Model A1984, that had been mailed, shipped, or transported in interstate and foreign commerce, in violation of Title 18, United States Code, Section 2251(a) and punishable under Title 18, United States Code, Section 2251(e).

COUNT II

The Grand Jury further charges that:

1. The allegations contained in paragraph one of Count I of this Indictment are incorporated by reference as if fully set forth herein.
2. On or between about June 3, 2020 and September 21, 2020, in Jefferson County, Missouri within the Eastern District of Missouri and elsewhere,

RONALD SAUNDERS,

the defendant herein, did knowingly receive image files and video files of child pornography using any means and facility of interstate and foreign commerce, to wit the defendant knowingly received image files and video files of child pornography via the internet, to include but not limited to the following:

- a. an image file in which A.W. is sitting on the floor fully nude and facing the mirror with her legs spread and one knee up. Her vagina and breasts are the focal point of the image as she photographs herself in the mirror (filename 93f14cf3-f2a3-4b3e-a31c-f6d720f93687.jpg);
- b. an video file in which A.W., visible from the waist down, is lying on a bed with her knees up and wearing only socks, masturbates with a vibrator (filename 728131ee-f26e-4344-9913-e6e31c219281.mp4); and
- c. a video of A.W. in which her bare breasts, vagina and part of her face and hair are visible. She inserts a pink hairbrush in her vagina and masturbates (filename f72de018-084d-4b8f-b46dff9a27252c4c.mp4).

in violation of 18 U.S.C. § 2252A(a)(2).

COUNT III

The Grand Jury further charges that:

1. The allegations contained in paragraph one of Count I of this Indictment are incorporated by reference as if fully set forth herein.

2. On or between about June 3, 2020 and September 21, 2020, in Jefferson County, Missouri within the Eastern District of Missouri and elsewhere,

RONALD SAUNDERS,

the Defendant herein, did use any facility and means of interstate commerce, and did knowingly attempt to persuade, induce, entice and coerce a minor, under the age of eighteen, to engage in sexual activity for which any person could be charged with a criminal offense, to wit: the Defendant, who was at least twenty-one years of age, communicated via the internet with A.W. who the Defendant knew to be under the age of eighteen, and attempted to persuade, induce, entice and coerce A.W. to engage in sexual activity, in violation of Missouri Revised Statutes Sections 573.023 (sexual exploitation of a minor), 573.200 (child used in a sexual performance), 573.205 (promoting sexual performance by a child) and Title 18 U.S.C. Section 2251(a) (production of child pornography)

in violation of Title 18, United States Code, Section 2422(b).

FORFEITURE ALLEGATION

The Grand Jury further finds by probable cause that:

1. Pursuant to Title 18, United States Code, Section 2253, upon conviction of an offense in violation of Title 18, United States Code, Sections 2251(a) and 2252A(a)(2) as set forth in Counts 1 and 2 of the Indictment, the defendant shall forfeit to the United States of America: any visual depiction as described in Sections 2251, 2251A, 2252, 2252A or 2260 of Title 18, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of Chapter 110 of Title 18; any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; and any property, real or personal, used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property.

2. If any of the property described above, as a result of any act or omission of the defendant:
 - a. cannot be located upon the exercise of due diligence;
 - b. has been transferred or sold to, or deposited with, a third party;
 - c. has been placed beyond the jurisdiction of the court;
 - d. has been substantially diminished in value; or
 - e. has been commingled with other property which cannot be divided without difficulty,

the United States of America will be entitled to the forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

A TRUE BILL.

FOREPERSON

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